

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

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Case No: 16-30408
Chapter 13

TRUSTEE'S OBJECTION TO EXEMPTIONS AND NOTICE OF OBJECTION

COMES NOW, Susan H. Call, Counsel for Carl M. Bates the Chapter 13

Trustee, pursuant to Federal Rule of Bankruptcy procedure 4003(b), and as for her

Objection to Exemptions taken by the Debtors in property of this estate, states as follows:

1. On February 2, 2016, Debera Ann Walker (“Debtor”) filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code.

2. Carl M. Bates is appointed Chapter 13 Trustee in this case and continues to serve as Trustee.

3. The first meeting of creditors was held on March 3, 2016 and was concluded.

4. Debtor, in Schedule C, of her Bankruptcy Petition (“Schedule C”) has indicated they she is claiming equity in “Stocks for corporate employer” (hereinafter known as “stocks”) in the amount of \$2,027.00 exempt under Va. Code Ann. § 34-34.

5. Upon evidence, and belief, the claim for the “stocks” is not one of such a nature that is exempt under Va. Code Ann. § 34-34.

6. Susan H. Call, Counsel for the Chapter 13 Trustee, avers that the exemption claims of the Debtor for the “stocks” is not proper under the code section claimed, and should be disallowed.

Susan H. Call, Esquire
Staff Counsel for
Carl M. Bates
P.O. Box 1819
Richmond, VA 23218-1819
(804) 237-6800
VSBN 34367

WHEREFORE, the Chapter 13 Trustee, by Counsel, prays for entry of an Order by this Court: determining that the exemption taken by the Debtor, with respect to the aforementioned “stock” claimed exempt on Schedule C, is improper and disallowed in full under Va. Code Ann. § 34-34, and granting such other and further relief as is just.

/s/Susan H. Call
Susan H. Call,
Counsel for
Carl M. Bates
Chapter 13 Trustee

Certificate of Service

I hereby certify that on April 1, 2016, I have mailed or hand-delivered a true copy of the foregoing Objection to Exemption to the debtor(s), Debera Ann Walker, 1653 W. Clara Dr., Petersburg, VA 23803 and electronically sent to debtor’s attorney, Richard James Oulton, Esquire, 2debtlawgroup@gmail.com.

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee

Susan H. Call, Esquire
Staff Counsel for
Carl M. Bates
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UNITED STATES BANKRUPTCY COURT
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[illegible]

Debtor Address 1653 W. Clara Drive
Petersburg, VA 23803

Last four digits of Social Security No(s).: 3200

NOTICE OF OBJECTION TO EXEMPTIONS

Carl M. Bates, by Counsel, the Chapter 13 Trustee in Bankruptcy (the “Trustee”) has filed a **“TRUSTEE’S OBJECTION TO EXEMPTIONS”** (the “Objection”) with the Court, seeking to disallow exemptions in property claimed by debtor, Debera Ann Walker (the “Debtor”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to sustain the Objection, or if you want the court to consider your views on the Objection, you or your attorney must: File with the court, on or before **twenty-one days** from the service date of this Notice, at the address shown below, a written response to the Objection requesting a Hearing.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

Susan H. Call
Counsel for Carl M. Bates, Chapter 13 Trustee
P. O. Box 1819
Richmond, VA 23218

Susan H. Call, Esquire
Staff Counsel for
Carl M. Bates
P.O. Box 1819
Richmond, VA 23218-1819
(804) 237-6800
VSBN 34367

OR Attend a hearing to be scheduled at **April 27, 2016, 2016 at 11:10 am at The United States Bankruptcy Court for the Eastern District of Virginia, 701 East Broad Street, Room 5000, Richmond, Virginia 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and permit the sale to proceed without further action of the Court.

Date: April 1, 2016

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee

Certificate of Service

I hereby certify that on April 1, 2016, I have mailed or hand-delivered a true copy of the foregoing Notice of Objection to Exemption to the debtor(s) Debera Ann Walker, 1653 W. Clara Dr., Petersburg, VA 23803 and electronically sent to debtor's attorney, Richard James Oulton, Esquire, 2debtlawgroup@gmail.com.

/s/Susan H. Call
Susan H. Call, Counsel for
Carl M. Bates
Chapter 13 Trustee